

# EXHIBIT H

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF CONNECTICUT

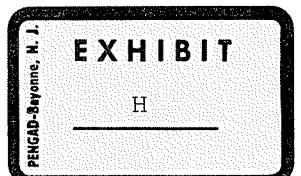
BROCK LESNAR,	)	CIVIL ACTION NO:
	)	3:05CV221 (CFD)
Plaintiff,	)	
v.	)	
	)	
WORLD WRESTLING	)	
ENTERTAINMENT, INC.,	)	
	)	
Defendant.	)	JUNE 30, 2005

**INITIAL DISCLOSURE STATEMENT OF DEFENDANT**  
**WORLD WRESTLING ENTERTAINMENT, INC.**

Defendant World Wrestling Entertainment, Inc. ("WWE"), pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, hereby submits its Initial Disclosure Statement (the "Statement") to Plaintiff Brock Lesnar ("Plaintiff" or "Lesnar"). This Statement is based on the information reasonably available and currently known to WWE regarding the claims and defenses alleged in the Complaint filed by Plaintiff and/or the Answer and Counterclaim filed by WWE in the above-captioned action. WWE reserves the right to supplement and/or amend this Statement during the course of discovery and as its investigation continues as required by Rule 26(e) of the Federal Rules of Civil Procedure.

**I. PERSONS WITH DISCOVERABLE INFORMATION**

The following individuals, among others that may be identified as this matter proceeds, are likely to have discoverable information that WWE may use to support its defenses and counterclaims:



A. Vincent McMahon

Chairman, WWE  
1241 East Main Street  
Stamford, CT 06902  
(203) 352-8600

Mr. McMahon may have discoverable information regarding, among other things, (i) WWE's contractual relationship with Lesnar and/or Brock Lock, LLC, (ii) the facts and circumstances surrounding the Settlement Agreement and General Release of All Claims (the "Settlement Agreement") dated May 6, 2004 and effective March 15, 2004 between Lesnar and WWE, (iii) WWE's communications with Lesnar and/or agents acting on his behalf regarding Lesnar's demands to return to WWE, and (iv) the uniqueness of Lesnar's services.

B. Edward Kaufman, Esq.

Senior Vice President and General Counsel, WWE  
1241 East Main Street  
Stamford, CT 06902  
(203) 352-8600

Mr. Kaufman may have discoverable information regarding, among other things, (i) WWE's contractual relationship with Lesnar and/or Brock Lock, LLC, (ii) the facts and circumstances surrounding the Settlement Agreement, and (iii) WWE's communications with Lesnar and/or agents acting on his behalf regarding his breach of the Settlement Agreement and Lesnar's demands to return to WWE.

C. Jerry Brisco

Agent, WWE  
1241 East Main Street  
Stamford, CT 06902  
(203) 352-8600

Mr. Brisco may have discoverable information regarding (i) the services rendered and which were to be rendered to WWE by Lesnar prior to Lesnar's breach of his contract, (ii) the uniqueness of Lesnar's services, (iii) the promotion of Lesnar and associated time and expense incurred by WWE in doing so; and (iv) the facts and circumstances surrounding the Settlement Agreement.

**D. Frank Serpe**

Senior Vice President and Chief Accounting Officer, WWE  
1241 East Main Street  
Stamford, CT 06902  
(203) 352-8600

Mr. Serpe may have discoverable information regarding the amounts paid to Lesnar pursuant to his booking contracts with WWE as well as pursuant to the Settlement Agreement.

**E. Ira Berg, Esq.**

Vice President, Legal, WWE  
1241 East Main Street  
Stamford, CT 06902  
(203) 352-8600

Mr. Berg may have discoverable information regarding, among other things, (i) WWE's contractual relationship with Lesnar and/or Brock Lock, LLC, and (ii) WWE's Settlement Agreement with Lesnar.

**F. Plaintiff Brock Lesnar**

Mr. Lesnar may have discoverable information regarding, among other things, (i) his breach of his booking contract, (ii) the facts and circumstances surrounding the Settlement Agreement with WWE, (iii) Lesnar's appearance at the New Japan Pro Wrestling event on or around January 4, 2005, (iv) his breach of the Settlement Agreement, (v) payments received by or on behalf of Lesnar for his appearance at the New Japan Pro Wrestling event, and (vi) his communications and/or negotiations with professional wrestling, ultimate fighting, shoot fighting and/or sports entertainment organizations, entities, or persons, including, but not limited to, New Japan Pro Wrestling.

**G. David B. Olsen, Esq.**

Mr. Olsen may have discoverable information regarding, among other things, (i) Lesnar's breach of his booking contract, (ii) the facts and circumstances surrounding the Settlement Agreement between Lesnar and WWE, (iii) Lesnar's appearance at the New Japan Pro Wrestling event on or around January 4, 2005, (iv) payments received by or on behalf of Lesnar for his appearance at the New Japan Pro Wrestling event, (v) Lesnar's communications and/or negotiations with professional wrestling, ultimate fighting, shoot fighting and/or sports entertainment organizations, entities, or persons, including, but not limited to, New Japan Pro Wrestling, and (vi) communications with WWE on behalf of Lesnar regarding Lesnar's proposals to return to WWE.

**H. Rena Mero**

Ms. Mero may have discoverable information regarding, among other things, (i) Lesnar's appearance at the New Japan Pro Wrestling event on or around January 4, 2005, (ii) payments received by or on behalf of Lesnar for his appearance at the New Japan Pro Wrestling event, and (iii) Lesnar's communications and/or negotiations with professional wrestling, ultimate fighting, shoot fighting and/or sports entertainment organizations, entities, or persons, including, but not limited to, New Japan Pro Wrestling.

**I. Brad Rheingans**

Mr. Rheingans may have discoverable information regarding, among other things, (i) Lesnar's appearance at the New Japan Pro Wrestling event on or around January 4, 2005, (ii) payments received by or on behalf of Lesnar for his appearance at the New Japan Pro Wrestling event, and (iii) Lesnar's communications and/or negotiations with professional wrestling, ultimate fighting, shoot fighting and/or sports entertainment organizations, entities, or persons, including, but not limited to, New Japan Pro Wrestling.

**II. DOCUMENTS WITHIN DEFENDANT'S POSSESSION, CUSTODY, OR CONTROL**

WWE has in its possession, custody, or control non-privileged documents that it may use to support its claims and defenses that fall into the following categories:

- (a) All contracts entered between WWE and Lesnar, including, but not limited to, the WWE Booking Contract effective July 1, 2003 and the Settlement Agreement and General Release of All Claims, executed May 6, 2004 and effective March 15, 2004,
- (b) Works recording Lesnar's performances and skills,
- (c) Documents sufficient to show Lesnar's earnings from WWE, and
- (d) E-mails received by WWE from David B. Olsen, Esq., counsel for Lesnar, regarding Lesnar's appearance at the New Japan Pro Wrestling event on or about January 4, 2005 at the Tokyo Dome in Tokyo, Japan.

These documents are located either at WWE's place of business or at the offices of WWE's counsel.

**III. COMPUTATION OF ANY CATEGORY OF DAMAGES CLAIMED**

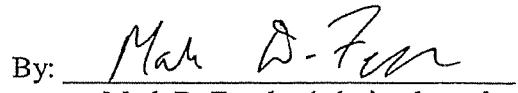
Money damage computation is not applicable at this time. WWE, however, seeks the following relief:

- (1) An order declaring that Lesnar has breached the Settlement Agreement;
- (2) An order declaring that as a result of Lesnar's breach of the Settlement Agreement, Lesnar has forfeited and is no longer entitled to royalty payments pursuant to the Settlement Agreement and that WWE is no longer obligated to pay Lesnar royalties pursuant to the Settlement Agreement;
- (3) An order temporarily and permanently enjoining and preventing Lesnar from breaching the provisions of the Settlement Agreement in the future; and
- (4) Such other and further relief as this Court deems just and appropriate.

IV. INSURANCE AGREEMENTS

Not applicable.

Respectfully submitted,

By:   
Mark D. Feczko (admitted *pro hac vice*)

Jerry S. McDevitt (admitted *pro hac vice*)  
Christopher Michalski (admitted *pro hac vice*)  
KIRKPATRICK & LOCKHART NICHOLSON  
GRAHAM LLP  
535 Smithfield Street  
Pittsburgh, PA 15222  
(412) 355-6500

Daniel L. Schwartz, Esq. (ct09862)  
Day, Berry & Howard LLP  
One Canterbury Green  
Stamford, Connecticut 06901  
(203) 977-3000

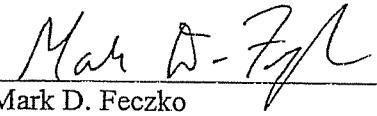
Attorneys for Defendant,  
World Wrestling Entertainment, Inc.

**CERTIFICATION OF SERVICE**

This is to certify that a copy of the foregoing was sent by facsimile and first class mail, postage prepaid, on the date hereof to the following counsel of record:

Scott S. Centrella, Esq.  
Diserio Martin O'Connor & Castiglioni LLP  
One Atlantic Street  
Stamford, CT 06901  
Fax: 203-348-2321

June 30, 2005

  
\_\_\_\_\_  
Mark D. Feczko